

1 **JOE HILL**
2 HILL LAW OFFICES
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7 Attorney for Plaintiff
8 Glenda R. Tinay

9
10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE**
12 **NORTHERN MARIANA ISLANDS**

13
14 **GLENDA R. TINAY,**

15 **Civil Action No. 05-0003**

16 **Plaintiff,**

17 **DECLARATION OF**
18 **ATTORNEY'S FEES AND**
19 **COSTS**

20 **RICARDO P. BAUTISTA JR.,**

21 **Defendant.**

22
23 I, **JOE HILL**, hereby depose and say:

1 I am over the age of eighteen (18) years, have personal
2 knowledge of the matters set forth herein and am competent to testify as to
3 such matters in a court of law.

4 I am the attorney for Plaintiff in the above-entitled matter.

1 3. I am a graduate of the University of California, Los Angeles
2 Law School and have been a licensed attorney since 1973, approximately 34
3 years.

4 4. That I served variously as an Assistant Attorney General
5 and Acting Attorney General of the CNMI from 1979 to 1982 and as counsel
6 to the Department of Labor and Immigration.

7 5. That I have been in private practice in Saipan since 1982
8 with substantial work in areas of employment law, workers rights and civil
9 rights litigation and issues in the local Commonwealth Courts, Federal District
10 Court and the Ninth Circuit Court of Appeals.

11 6. My hourly fee of \$ 200.00 approximates the average local
12 prevailing rate for attorneys with similar qualifications and experience, but
13 may be slightly lower. The \$ 200.00 fee is reasonable and justified based on
14 the factors set forth herein.

15 7. This office bills out its accountant Alma Ng at \$ 40.00 per
16 hour. The accountant, Ms. Ng, has a bachelor of science degree with a major
17 in accounting, and was a certified public accountant in the Philippines, and has
18 been employed in this office for more than 16 years.

1 8. This office billed out its paralegal, Mario Corpus and Roly
2 Calayo at \$60.00 per hour. Both paralegals are graduates of law school in the
3 Philippines. Roly Calayo is a member of the Philippine Bar with ten (10) years
4 of law practice experience.
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6 9. That I and my staff performed the following services and
7 worked the hours indicated which were reasonably, necessary, and actually
8 done, in this matter.

9 a.	11-19-04	Initial interview with client, and Tagalog translator (paralegal)	2.00	
10	b.	11-20-04	Review of client's contract, records and documents	.75
11	c.	11-30-04	Conference with paralegal re: causes of action and procedural approach to case	3.00
12	d.	12-03-04	Second Conference with client, paralegal (translator) and accountant	1.50
13	e.	12-09-04	Legal research on Jurisdictional Grounds	1.00
14	f.	12-17-04	Preparation of 1 st draft outline by paralegal of Complaint	4.00
15	g.	12-22-04	Review/research of 1st draft of Complaint by JH	5.75
16	h.	12-28-04	Reformatting/redrafting of 1 st draft of Complaint by paralegal	2.00
17	i.	1-20-05	Research and Review of 2nd draft of Complaint by JH	2.00

1	j.	1-22-05	Preparation of final draft of Complaint by paralegal	2.50
2	k.	1-27-05	Review of final Complaint, Cover Sheet and Summons by JH	.50
3	l.	1-28-05	Review of Return of Service	.06
4	m.	2-02-05	Preparation and Notice of Filing of Complaint in District Court, filed with CNMI Division of Labor.	.40
5	n.	2-17-05	Review of letter from Jed Horey and letter to Jed Horey re Def.'s Answer	.50
6	o.	3-21-05	Review of Defendant's Motion To Dismiss/Declaration of Defendant/Notice of Hearing	4.00
7	p.	3-22-05	Research re Plaintiff's Opposition To Motion to Dismiss	1.75
8	q.	3-23-05	Legal research re Plaintiff's Opposition to MTD	3.00
9	r.	3-24-05	Review of Order and calendaring Status Conference	.10
10	s.	4-01-05	Status Conference	.50
11	t.	4-05-05	Research and preparation of 1 st draft of Plaintiff's Opposition To Motion to Dismiss	5.50
12	u.	4-06-05	Research and preparation of 2nd draft of Opposition to Motion to Dismiss	.50
13	v.	4-07-05	Research and preparation of final Opposition to Motion to Dismiss	1.50
14	w.	4-08-05	Errata re Opposition to Motion to Dismiss	.50

1	x.	4-14-05	Review of Defendant's Reply in Support of Motion to Dismiss	.50
2	y.	4-21-05	Hearing on Motion to Dismiss	1.00
3	z.	4-21-05	Review of Order Denying Defendant's Motion to Dismiss	.25
4	aa.	5-05-05	Review of Defendant's Answer	.40
5	bb.	5-06-05	Review of Order and calendaring Case Management Conference	.20
6	cc.	5-09-05	Review of Jury Demand	.10
7	dd.	5-12-05	Review of Defendant's Pre- Discovery Disclosure Statement	.20
8	ee.	5-13-05	Preparation of Plaintiff's Initial Disclosures	1.00
9	ff.	5-18-05	Preparation of Plaintiff's Case Management Conference Statement	.50
10	gg.	5-23-05	Review of Defendant's Case Management Conference Statement	.20
11	hh.	5-26-05	Case Management Conference	1.00
12	ii.	5-26-05	Review of and calendaring Case Management Scheduling Order	.50
13	jj.	6-09-05	Review of Defendant's Amended Pre-Discovery Disclosure Statement, Motion to Withdraw As Counsel for Defendant/ Declaration of Jed Horey	.30
14	kk.	6-10-05	Review of Order Granting Motion To Withdraw; Re-Affirming Continuing Validity of All Dates And Deadlines	.10
15	ll.	8-01-05	Notice of Deposition	.50
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1	mm.	9-02-05	Status Conference	.20
2	nn.	9-06-05	Review of Order After Status Conference	.10
3	oo.	10-11-05	Review of Letter of Randy Schmidt To Defendant re ex parte contact	.10
4	pp.	10-28-05	Settlement Conference	.20
5	qq.	10-28-05	Review of Order After Scheduled Settlement Conference	.10
6	rr.	11-18-05	Pre-Trial Conference	.50
7	ss.	11-18-05	Review of Order Striking Answer of Defendant and Entering Default Against Him	.10
8	tt.	6-20-07	Preparation of Plaintiff's Ex Parte Motion to Re-Open File And Set Hearing on Damages And To Correct Clerical Error Under Rule 60(a) by paralegal	1.00
9	uu.	6-22-07	Review of Plaintiff's Ex Parte Motion to Re-Open File And Set Hearing on Damages And To Correct Clerical Error Under Rule 60(a) by Joe Hill	1.00
10	vv.	6-25-07	Review of Order Correcting Mistake in Prior Order and Setting Hearing on Damages	.10
11	ww.	7-03-07	Conference/preparation with client and paralegal (translator) for damages hearing	1.50
12	xx.	7-05-07	Hearing on damages with client and paralegal(translator)	1.00
13	yy.	7-05-07	Preparation of declaration of Attorney's fees and costs	1.50

Total hours performed by Attorney Hill	47.96
Total attorney's fees (** hours x \$200.00 hourly rate)	\$9,592.00

CALCULATION OF COSTS/EXPENSES

	A.	Work and hours performed by Alma Ng re computations of amounts due 3.50 hours x \$ 40.00	\$140.00
	B.	Work and hours performed by Mario Corpus and Roly Calayo (paralegal/translator) 18.5 hours x \$60.00	\$1,110.00
	C.	Costs incurred	\$162.10
	Total Costs		\$1,322.10
	GRAND TOTAL OF ATTORNEY'S FEES AND COSTS		\$11,004.10

I declare under penalty of perjury that the foregoing is true and correct
and that this declaration was executed on this 5th day of July 2007 in Susupe,
Saipan, Commonwealth of the Northern Mariana Islands.

/S/ _____
JOE HILL
Declarant